

From: [Blend, Jeff](#)
To: [Blend, Jeff](#); [Suplee, Mike](#); [Tina Laidlaw/MO/R8/USEPA/US@EPA](#); [LaVigne, Paul](#)
Subject: RE: WERF
Date: 08/09/2011 10:00 AM

P 82 of WERF:

Nonpoint sources of nitrogen and phosphorus are significant (Chapter 2.0). A significant reduction in nitrogen and phosphorus might be achievable by using sustainable best management practices that could have considerably less impact on GHG emissions than high levels of treatment at municipalities.

The WERF conclusions have been very useful in framing this for me, even though it is still a draft document. Our variance levels in SB367 are right around Level 2 treatment as defined in WERF, whereas our base numeric criteria are slightly stricter than Level 5, which is deemed very expensive and very GHG emissions intensive.

Jeff Blend
(406) 841-5233
jblend@mt.gov

Economist and Energy Analyst
Energy and Pollution Prevention Bureau
Montana Dept. of Environmental Quality
1100 N. Last Chance Gulch
P.O. Box 200901
Helena, MT 59620-0901

-----Original Message-----

From: Blend, Jeff
Sent: Tuesday, August 09, 2011 9:54 AM
To: Suplee, Mike; 'Tina Laidlaw'; LaVigne, Paul
Subject: WERF

From WERF study (draft):

Conclusions (p. 78):

Rather than attempt to comply with a Level 4 or 5 treatment objective, a combination of Level 3 treatment objectives and best management practices for non-point source loads might be a more viable approach at meeting the overall load targets on the receiving water body.

That is what the Nutrient Work group has been saying, although they would probably prefer to only meet level 2 rather than level 3.

Jeff Blend
(406) 841-5233
jblend@mt.gov

Economist and Energy Analyst
Energy and Pollution Prevention Bureau
Montana Dept. of Environmental Quality
1100 N. Last Chance Gulch
P.O. Box 200901
Helena, MT 59620-0901